

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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OLGA CRISTINA QUITO, *individually and on behalf
of others similarly situated,*

Docket No.:
16-cv-6634 (BMC)

Plaintiffs,

-against-

EL PEDREGAL RESTAURANT, CORP. (d/b/a EL
TRONO DE MEXICO SPORTS BAR) HUGO
LOPEZ, JUAN LOPEZ, JESUS RAMIREZ and
ERIKA SAAVEDRA,

Defendants.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed declaration of Marisol Santos, sworn to on May 24, 2017, and the annexed memorandum of law, the undersigned will move this Court, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, 11201, before the Honorable Brian M. Cogan, for an Order awarding Plaintiffs the costs and reasonable attorneys' fees associated with this action, together with such other and further relief as the Court may deem just and proper.

Dated: New York, New York
May 24, 2017

MICHAEL FAILLACE & ASSOCIATES, P.C.

By: /s/ Marisol Santos
Marisol Santos, Esq.
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